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September 11, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Marlene H. Dortch, Esquire

Secretary

Federal Communications Commission

445 12th Street, S.W., Room TW-B204

Washington, D.C. 20554

Attn: The Honorable Arthur I. Steinberg
Administrative Law Judge

Re: EB Docket No. 03-152

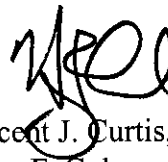
Dear Ms. Dortch:

On behalf of Richard B. Smith, pursuant to Section 1.223 of the Commission's Rules, there is transmitted herewith, an original and six copies of a Supplement to Consolidated Reply to Oppositions to Petition for Leave to Intervene.

If additional information is necessary, please communicate with this office.

Please date stamp the extra enclosed copy and return it to the undersigned.

Very truly yours,



Vincent J. Curtis, Jr.

Harry F. Cole

Susan A. Marshall

Counsel for Richard B. Smith

VJC/st

Enclosure

cc. See Certificate of Service

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP 11 2003
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNGS, Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC)	Facility ID No. 3365
)	
Permittee of FM Station KAAX, Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	Facility ID No. 9993
)	
Permittee of FM Station KAJP, Firebaugh, California)	
)	
H.L. CHARLES D/B/A FORD CITY BROADCASTING)	Facility ID No. 22030
)	
Permittee of FM Station KZPE, Ford City, California)	
)	
LINDA WARE D/B/A LINDSAY BROADCASTING)	Facility ID No. 37725
)	
Licensee of FM Station KZPO, Lindsay, California)	
)	
In re Application of)	
)	
WESTERN PACIFIC BROADCASTING, INC.)	File No. BR-19970804YJ
)	Facility ID No. 71936
For Renewal of License for AM Station KKFO, Coalinga, California)	
)	
TO: The Honorable Arthur I. Steinberg Administrative Law Judge		

**SUPPLEMENT TO CONSOLIDATED REPLY TO OPPOSITIONS
TO PETITION FOR LEAVE TO INTERVENE**

Earlier today Richard B. Smith submitted his "Consolidated Reply to Oppositions to Petition for Leave to Intervene" in this proceeding. In that pleading we indicated that we had been able to locate only one "hybrid" revocation/application proceeding in which intervention pursuant to Section 1.223 had been sought. We have since located one additional "hybrid" revocation/application proceeding, *Gerard A Turro*, MM Docket No. 97-122, the caption of which included renewal applications (for two FM translator stations) and the revocation of a full service FM license. The proceeding was initiated as the result of information which was submitted to the Commission by a complainant, much as happened here. In the hearing designation order in that proceeding, FCC 97-137, released April 18, 1997, the Commission made the complainant a party to the proceeding without the need to seek intervention and without regard to any distinctions which might be drawn between the "application" and "revocation" aspects of the case.

Respectfully submitted,



Vincent L. Curtis, Jr., Esq.
Harry F. Cole, Esq.
Susan A. Marshall, Esq.

Counsel for Richard B. Smith

Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
(703) 812-0400

September 11, 2003

CERTIFICATE OF SERVICE

I, Suzanne Thompson, a secretary in the law firm of Fletcher, Heald & Hildreth, P L.C., do hereby certify that a copy of the foregoing "Supplement to Consolidated Reply To Oppositions To Petition For Leave To Intervene" was sent this 11th day of September, 2003, by first-class United States Mail, postage prepaid to:

Howard J. Braun, Esquire
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Maureen F. Del Duca, Chief
James W. Shook, Esquire (by hand and email)
David M. Janas, Esquire
Investigations and Hearings Division, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-B443
Washington, DC 20554

The Honorable Arthur I. Steinberg (by hand and fax)
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W. – Room 1-C861
Washington, D.C. 20054


Suzanne Thompson